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MEMO ENDORSED

January 15, 2008

BY FACSIMILE

The Honorable Victor Marrero
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Suite 660
Courtroom 20B
New York, NY 10007

Re: Nancy Feldman v. Bolivian Investors Group, Inc.
Case No. 07 CV 6337 (VM)

Dear Judge Marrero:

This letter is a request for an extension of ten days until January 25, 2008 to respond to the Plaintiff's First Request for Documents and Interrogatories. The parties in this case were scheduled to exchange responses on January 16, 2008. Due to the fact that the Defendant in this case is based in Bolivia, Defendants attorneys have not been able to acquire all the materials necessary to furnish the required responses.

Defendant in this case is represented locally by Charles E. Dorkey III of McKenna Long & Aldridge LLP. Lead counsel in this case is Glen Franklin Koontz of the firm Martin & Seibert L.C. of Martinsburg, West Virginia. The Plaintiff is represented by Donald C. Moss of Moss & Moss LLP.

Mr. Moss, while reserving all rights and consistent with his position in previous requests, will not oppose this request for an extension of ten days to January 25, 2008 if all other dates in the scheduling order are adjusted forward by an equivalent period.

The Honorable Victor Marrero
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If your Honor approves, on January 25, 2008 both sides will exchange the required information.

Respectfully yours,




Charles E. Dorkey III

cc: Donald C. Moss, Esq. (by facsimile)
Glen Franklin Koontz, Esq. (by facsimile)

CED:cbg

NY:12050750.1

The time for defendant to respond to Plaintiff's 7-2-07 Request for Documents and Discovery is extended to 1-25-08. All other dates in the scheduling order herein are correspondingly extended.	
SO ORDERED:	
1-15-08	
DATE	VICTOR MARRERO, U.S.D.J.